



*United States Attorney
Southern District of New York*

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March 26, 2025

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Widakuswara, et al. v. Lake, et al.*,
25 Civ. 2390 (JPO)

Dear Judge Oetken:

On behalf of defendants U.S. Agency for Global Media (“USAGM”), Kari Lake, in her official capacity as Senior Advisor to the Acting CEO of USAGM, and Victor Morales, in his official capacity as Acting CEO of USAGM (collectively, the “Government” or “Defendants”), we write respectfully to request that the Government’s time to respond to Plaintiffs’ motion for a temporary restraining order be extended from Thursday, March 27, at 5:00 p.m. to Friday, March 28, at midnight, and that the hearing scheduled for Friday, March 28, at 10:00 a.m. be adjourned to a time as early as practicable on Monday, March 31. We sincerely apologize for the lateness of this request.

The requested briefing extension is necessary to permit the undersigned attorneys sufficient time to prepare the Government’s response to Plaintiffs’ voluminous submissions and to obtain necessary information from the agency. We understand that Plaintiffs object to this request and state: “In light of the irreparable harms faced by Plaintiffs, made more immediate by Defendants’ mass termination-related notices sent last night, *see* Dkt. No. 33, Plaintiffs do not consent to Defendants’ proposed extension but renew our offer to agree to an extended briefing schedule for a preliminary injunction if Defendants agree to stipulate to Plaintiffs’ proposed TRO to preserve the immediate status quo pending the Court’s determination.” At this time, Defendants have not authorized this Office to consent to this request.

We relatedly note that Plaintiffs’ letter contends that “Defendants may be using any delay in this case to advance their unlawful plan,” *see* Dkt. No. 33, at 2, but this Office submits this request in good faith and solely for purposes of obtaining the time it requires to complete its response. We also note that this Office did not learn that Defendants would be issuing the notices of reductions in force discussed in Plaintiffs’ letter until late last night, shortly before they were issued.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: All Counsel of Record (via ECF)